

Thiago M. Coelho, SBN 324715  
[thiago@wilshirelawfirm.com](mailto:thiago@wilshirelawfirm.com)  
Binyamin I. Manoucheri, SBN 336468  
[binyamin@wilshirelawfirm.com](mailto:binyamin@wilshirelawfirm.com)

**WILSHIRE LAW FIRM**  
3055 Wilshire Blvd., 12<sup>th</sup> Floor  
Los Angeles, California 90010  
Telephone: (213) 381-9988  
Facsimile: (213) 381-9989

*Attorneys for Plaintiff, Portia Mason*

**UNITED STATES DISTRICT COURT**

**FOR THE CENTRAL DISTRICT OF CALIFORNIA**

PORTIA MASON, an individual,  
Plaintiff.

v.  
GALATI, LLC d/b/a IL SEGRETO  
RISTORANTE, a California limited  
liability company; and DOES 1 to 10,  
inclusive.

## Defendants.

CASE No.:

## **COMPLAINT**

1. VIOLATIONS OF THE  
AMERICANS WITH  
DISABILITIES ACT OF 1990, 42  
U.S.C. § 12181
  2. VIOLATIONS OF THE UNRUH  
CIVIL RIGHTS ACT,  
CALIFORNIA CIVIL CODE § 51  
**DEMAND FOR JURY TRIAL**

Plaintiff Portia Mason (hereafter “Plaintiff”) brings this action based upon personal knowledge as to herself and her own acts, and as to all other matters upon information and belief, based upon, *inter alia*, the investigations of her attorneys.

## **NATURE OF THE ACTION**

1. Plaintiff is a visually impaired and legally blind individual who requires screen-reading software to read website content using her computer. Plaintiff uses the terms “blind” or “visually-impaired” to refer to all people with visual impairments who meet the legal definition of blindness in that they have a

visual acuity with correction of less than or equal to 20 x 200. Some blind people who meet this definition have limited vision. Others have no vision.

2. Plaintiff brings this Complaint to secure redress against Galati, LLC d/b/a il Segreto Ristorante (hereafter “Defendant”), and DOES 1-10, for its failure to design, construct, maintain, and operate its website to be fully and equally accessible to and independently usable by Plaintiff. Defendant’s denial of full and equal access to its website, and therefore denial of its products and services offered thereby and in conjunction with its physical location, is a violation of Plaintiff’s rights under the Americans with Disabilities Act (“ADA”) and California’s Unruh Civil Rights Act (“UCRA”).

3. Because Defendant's website, <https://www.ilsegretoristorante.com/> (the "website" or "Defendant's website"), is not fully or equally accessible to blind and visually impaired consumers in violation of the ADA, Plaintiff seeks a permanent injunction to cause a change in Defendant's corporate policies, practices, and procedures so that Defendant's website will become and remain accessible to Plaintiff and other blind and visually impaired consumers.

## THE PARTIES

4. Plaintiff, at all times relevant and as alleged herein, is a resident of the County of Los Angeles. Plaintiff is a legally blind, visually impaired, handicapped person, and a member of a protected class of individuals under the ADA, pursuant to 42 U.S.C. § 12102(1)-(2), and the regulations implementing the ADA set forth at 28 CFR §§ 36.101 *et seq.*

5. Defendant is a California limited liability company with its headquarters in Beverly Hills, California. Defendant's servers for the website are in the United States. Defendant conducts a large amount of its business in California. The physical location where Defendant's goods and services are sold to the public constitutes a place of public accommodation pursuant to 42 U.S.C. § 12181(7)(A), as Defendant owns, operates, and control a brick-and-mortar restaurant.

1 Defendant’s restaurant provides to the public important goods and services.  
2 Moreover, Defendant’s website provides consumers access to the goods and  
3 services which Defendant offers in its brick-and-mortar restaurant. For example,  
4 Defendant’s website allows consumers to find the restaurant’s brick-and-mortar  
5 location and hours of operation, make reservations at Defendant’s restaurant, order  
6 for pickup and delivery, and submit catering inquiries. Moreover, in conjunction  
7 with the restaurant’s reservation process, Defendant’s website also allows  
8 consumers to peruse Defendant’s menus and wine list. Finally, Defendant’s website  
9 allows consumers to access Defendant’s social media webpages, view online  
10 reviews of Defendant’s restaurant, read press releases, peruse Defendant’s photo  
11 and video gallery, and access Defendant’s contact information.

12       6. Plaintiff is unaware of the true names, identities, and capacities of each  
13 Defendant sued herein as DOES 1 to 10. Plaintiff will seek leave to amend this  
14 complaint to allege the true names and capacities of DOES 1 to 10 if and when  
15 ascertained. Plaintiff is informed and believes, and thereupon alleges, that each  
16 Defendant sued herein as a DOE is legally responsible in some manner for the  
17 events and happenings alleged herein and that each Defendant sued herein as a DOE  
18 proximately caused injuries and damages to Plaintiff as set forth below.

19       7.   Defendant's restaurant is a public accommodation within the  
20 definition of Title III of the ADA, 42 U.S.C. § 12181(7)(B).

21       8. The website provides access to the goods, services, privileges, and  
22 advantages of Defendant's brick-and-mortar location, a place of public  
23 accommodation, by allowing consumers to make reservations for Defendant's  
24 restaurant, purchase gift cards, and order online.

## **JURISDICTION AND VENUE**

26       9.     Defendant is subject to personal jurisdiction in this District. Defendant  
27 has been and continues to commit the acts or omissions alleged herein in the Central  
28 District of California, that caused injury, and violated rights prescribed by the ADA

1 and UCRA, to Plaintiff. A substantial part of the acts and omissions giving rise to  
2 Plaintiff's claims occurred in the Central District of California. Specifically, on  
3 several separate occasions, Plaintiff has been denied the full use and enjoyment of  
4 the facilities, goods, and services of Defendant's website in Los Angeles County.  
5 The access barriers Plaintiff has encountered on Defendant's website have caused  
6 a denial of Plaintiff's full and equal access multiple times in the past and now deter  
7 Plaintiff on a regular basis from accessing Defendant's website. Similarly, the  
8 access barriers Plaintiff has encountered on Defendant's website have impeded  
9 Plaintiff's full and equal enjoyment of goods and services offered at Defendant's  
10 brick-and-mortar location.

11 10. This Court also has subject-matter jurisdiction over this action  
12 pursuant to 28 U.S.C. § 1331 and 42 U.S.C. § 12181, as Plaintiff's claims arise  
13 under Title III of the ADA, 42 U.S.C. § 12181, *et seq* and 28 U.S.C. § 1367.

14 11. This Court has personal jurisdiction over Defendant because it  
15 conducts and continues to conduct a substantial and significant amount of business  
16 in the State of California, County of Los Angeles, and because Defendant's  
17 offending website is available across California.

18 12. Venue is proper in the Central District of California pursuant to 28  
19 U.S.C. § 1391 because Plaintiff resides in this District, Defendant conducts and  
20 continues to conduct a substantial and significant amount of business in this District,  
21 Defendant is subject to personal jurisdiction in this District, and a substantial  
22 portion of the conduct complained of herein occurred in this District.

23 13. Defendant owns, operates, and maintains a brick-and-mortar  
24 restaurant location in the State of California. Defendant's brick-and-mortar  
25 location offers goods and services to the public. Defendant also offers the very  
26 goods and services that are offered in Defendant's place of public accommodation  
27 to the public through the website. Defendant's brick-and-mortar restaurant location  
28 is a place of public accommodation pursuant to 42 U.S.C. § 12181(7)(B), and

1 Defendant's website is subject to the ADA because it provides methods by which  
2 consumers can access the goods and services offered in Defendant's restaurant,  
3 which are inaccessible to Plaintiff, a disabled screen-reader user.

4 **THE AMERICANS WITH DISABILITIES ACT AND THE INTERNET**

5 14. The Internet has become a significant source of information, a portal,  
6 and a tool for conducting business, doing everyday activities such as shopping,  
7 learning, banking, researching, as well as many other activities for sighted, blind,  
8 and visually impaired persons alike.

9 15. In today's tech-savvy world, blind and visually impaired people have  
10 the ability to access websites using keyboards in conjunction with screen access  
11 software that vocalizes the visual information found on a computer screen. This  
12 technology is known as screen-reading software. Screen-reading software is  
13 currently the only method a blind or visually impaired person may use to  
14 independently access the internet. Unless websites are designed to be read by  
15 screen-reading software, blind and visually impaired persons are unable to fully  
16 access websites, and the information, products, and services contained thereon.

17 16. Blind and visually impaired users of Windows operating system-  
18 enabled computers and devices have several screen-reading software programs  
19 available to them. Some of these programs are available for purchase and other  
20 programs are available without the user having to purchase the program separately.  
21 Job Access With Speech, otherwise known as "JAWS," is currently the most  
22 popular, separately purchased and downloaded screen-reading software program  
23 available for a Windows computer.

24 17. For screen-reading software to function, the information on a website  
25 must be capable of being rendered into text. If the website content is not capable  
26 of being rendered into text, the blind or visually impaired user is unable to access  
27 the same content available to sighted users.

28 18. The international website standards organization, the World Wide

1 Web Consortium, known throughout the world as W3C, has published Success  
 2 Criteria for version 2.1 of the Web Content Accessibility Guidelines ("WCAG 2.1"  
 3 hereinafter). WCAG 2.1 are well-established guidelines for making websites  
 4 accessible to blind and visually impaired people. These guidelines are adopted,  
 5 implemented, and followed by most large business entities who want to ensure their  
 6 websites are accessible to users of screen-reading software programs. Though  
 7 WCAG 2.1 has not been formally adopted as the standard for making websites  
 8 accessible, it is one of, if not the most, valuable resource for companies to operate,  
 9 maintain, and provide a website that is accessible under the ADA to the public.  
 10 Plaintiff seeks Defendant comply with WCAG 2.1 as a remedy. Plaintiff does not  
 11 premise Defendant's violations of the ADA nor the Unruh Act on violations of  
 12 WCAG 2.1. However, the Department of Justice ("DOJ") has issued guidance on  
 13 how to make web content accessible to people with disabilities. The DOJ's  
 14 guidance provides that: "Existing technical standards provide helpful guidance  
 15 concerning how to ensure accessibility of website features. These include [WCAG]  
 16 and the Section 508 standards, which the federal government uses for its own  
 17 websites."<sup>1</sup> Accordingly, although not a sole basis to premise violations of the ADA  
 18 and the Unruh Act on, WCAG "provide helpful guidance concerning how to ensure  
 19 accessibility of website features."

20       19. Within this context, the Ninth Circuit has recognized the viability of  
 21 ADA claims against commercial website owners/operators with regard to the  
 22 accessibility of such websites. *Robles v. Domino's Pizza, LLC*, 913 F.3d 898, 905-  
 23 06 (9th Cir. 2019), *cert. denied*, 140 S.Ct. 122, 206 L. Ed. 2d 41 (2019). This is in  
 24 addition to the numerous courts that have already recognized such application.

25       20. Each of Defendant's violations of the Americans with Disabilities Act  
 26 is likewise a violation of the Unruh Civil Rights Act. Indeed, the Unruh Civil Rights  
 27 Act provides that any violation of the ADA constitutes a violation of the Unruh

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28 <sup>1</sup> <https://beta.ada.gov/resources/web-guidance/>

1 Civil Rights Act. Cal. Civ. Code § 51(f).

## 2 FACTUAL BACKGROUND

3       21. Defendant offers the website to the public. The website offers features  
 4 which should allow all consumers to access the goods and services which Defendant  
 5 offers in connection with its physical location. The goods and services offered by  
 6 Defendant include, but are not limited to, the following: reservations, online  
 7 ordering, and Defendant's catering services. Consumers can also use the website to  
 8 access information regarding Defendant's location and hours, Defendant's menu  
 9 options, Defendant's social media webpages, online reviews of Defendant's  
 10 restaurant, press releases, Defendant's photo and video gallery, and Defendant's  
 11 contact details.

12       22. Due to Defendant's failure to properly code its website, Plaintiff has  
 13 been and is still being denied equal and full access to Defendant's restaurant and  
 14 the numerous goods, services, and benefits offered to the public through  
 15 Defendant's website in conjunction with Defendant's brick-and-mortar restaurant.

## 16 THE WEBSITE BARRIERS DENY PLAINTIFF ACCESS

17       23. Plaintiff is a visually impaired and legally blind person, who cannot  
 18 use a computer without the assistance of screen-reading software. However,  
 19 Plaintiff is a proficient user of JAWS and uses it to access the internet. Plaintiff has  
 20 visited <https://www.ilsegretoristorante.com/> on June 28, 2022 and June 29, 2022  
 21 using the JAWS screen-reader. Plaintiff accessed the website on those dates to  
 22 order online.

23       24. During Plaintiff's visits to Defendant's website, Plaintiff encountered  
 24 multiple access barriers which denied Plaintiff full and equal access to the facilities,  
 25 goods, and services offered to the public and made available to the public on  
 26 Defendant's website. For example, Plaintiff, who desired to place an online order,  
 27 could not as a result of Defendant's coding failures. To give some context, Plaintiff  
 28 uses her keyboard to navigate websites, as she is not sighted and cannot use a

1 mouse. Thus, in order for Defendant's website to be readable by Plaintiff's screen-  
2 reader, Defendant must implement appropriate website coding practices so that the  
3 nonvisual elements of Defendant's website can be read aloud by Plaintiff's screen-  
4 reader.

5 25. If Defendant had sufficiently coded the website to be readable by  
6 Plaintiff's screen-reader and accessible with her keyboard, Plaintiff would have  
7 been able to interact with these elements and complete a reservation as a sighted  
8 person could.

9 26. Accordingly, Plaintiff was denied the ability to access Defendant's  
10 website and place an online order, a service which Defendant provides through the  
11 website in conjunction with its place of public accommodation, its restaurant,  
12 because Defendant failed to have the proper procedures in place to ensure that  
13 content uploaded to the website contains the proper coding to convey the meaning  
14 and structure of the website and the goods and services provided by Defendant.

15 27. Due to the widespread access barriers Plaintiff encountered on  
16 Defendant's website, Plaintiff has been deterred from accessing Defendant's  
17 website and Defendant's restaurant.

18 28. Despite Plaintiff's attempts to do business with Defendant on its  
19 website, the numerous access barriers contained on the website and encountered by  
20 Plaintiff, have denied Plaintiff full and equal access to Defendant's website and  
21 Defendant's restaurant. Plaintiff, as a result of the barriers on Defendant's website,  
22 continues to be deterred from accessing Defendant's website and Defendant's  
23 restaurant. Likewise, based on the numerous access barriers Plaintiff has been  
24 deterred and impeded from the full and equal enjoyment of goods and services  
25 offered in Defendant's restaurant.

26           **DEFENDANT'S WEBSITE HAS A SUFFICIENT NEXUS TO**  
27           **DEFENDANT'S RESTAURANT LOCATION TO SUBJECT THE**  
28           **WEBSITE TO THE REQUIREMENTS OF THE ADA**

1       29. Defendant's website is subject to the ADA because the goods and  
 2 services offered on the website are an extension of the goods and services offered  
 3 in Defendant's brick-and-mortar restaurant. For example, the goods and the  
 4 services which can be procured online are available for purchase in Defendant's  
 5 brick-and-mortar restaurant. Thus, since the website facilitates access to the goods  
 6 and services of a place of public accommodation, the website falls within the  
 7 protection of the ADA because the website connects customers to the goods and  
 8 services of Defendant's physical restaurant.

### 9           **DEFENDANT MUST REMOVE BARRIERS TO ITS WEBSITE**

10      30. Due to the inaccessibility of the Defendant's website, blind and  
 11 visually impaired customers such as Plaintiff, who need screen-readers, cannot fully  
 12 and equally use or enjoy the facilities and services Defendant offers to the public  
 13 on its website. The access barriers Plaintiff has encountered have caused a denial  
 14 of Plaintiff's full and equal access in the past and now deter Plaintiff on a regular  
 15 basis from accessing the website.

16      31. These access barriers on Defendant's website have deterred Plaintiff  
 17 from enjoying the goods and services of Defendant's brick-and-mortar restaurant  
 18 which are offered through Defendant's website in a full and equal manner to sighted  
 19 individuals. Plaintiff intends to visit the Defendant's website and restaurant in the  
 20 near future if Plaintiff could access Defendant's website as a sighted person can.

21      32. If the website were equally accessible to all, Plaintiff could  
 22 independently navigate the website and complete a desired transaction, as sighted  
 23 individuals do.

24      33. Plaintiff, through Plaintiff's attempts to use the website, has actual  
 25 knowledge of the access barriers that make these services inaccessible and  
 26 independently unusable by blind and visually impaired people.

27      34. The Defendant uses standards, criteria or methods of administration  
 28 that have the effect of discriminating or perpetuating the discrimination against

1 others, as alleged herein.

2       35. The ADA expressly contemplates the injunctive relief that Plaintiff  
 3 seeks in this action. In relevant part, the ADA requires:

4           In the case of violations of ... this title, injunctive relief shall include  
 5 an order to alter facilities to make such facilities readily accessible to  
 6 and usable by individuals with disabilities .... Where appropriate,  
 7 injunctive relief shall also include requiring the ... modification of a  
 8 policy .... 42 U.S.C. § 12188(a)(2).

9       36. Because Defendant's website has never been equally accessible, and  
 10 because Defendant lacks a corporate policy that is reasonably calculated to cause  
 11 the Defendant's website to become and remain accessible, Plaintiff invokes 42  
 12 U.S.C. § 12188(a)(2) and seeks a permanent injunction requiring the Defendant to  
 13 retain a qualified consultant acceptable to Plaintiff to assist Defendant to comply  
 14 with WCAG 2.1 guidelines for Defendant's website. The website must be  
 15 accessible for individuals with disabilities who use desktop computers, laptops,  
 16 tablets, and smartphones. Plaintiff seeks that this permanent injunction require  
 17 Defendant to cooperate with the agreed-upon consultant to: train Defendant's  
 18 employees and agents who develop the website on accessibility compliance under  
 19 the WCAG 2.1 guidelines; regularly check the accessibility of the website under  
 20 the WCAG 2.1 guidelines; regularly test user accessibility by blind or vision-  
 21 impaired persons to ensure that the Defendant's website complies under the WCAG  
 22 2.1 guidelines; and develop an accessibility policy that is clearly disclosed on the  
 23 Defendant's website, with contact information for users to report accessibility-  
 24 related problems and require that any third-party vendors who participate on the  
 25 Defendant's website to be fully accessible to the disabled by conforming with  
 26 WCAG 2.1.

27       37. If Defendant's website were accessible, Plaintiff could independently  
 28 access information about the services offered and goods available for online

purchase through Defendant's website and order online.

38. Although Defendant may currently have centralized policies regarding maintaining and operating Defendant's website, Defendant lacks a plan and policy reasonably calculated to make Defendant's website fully and equally accessible to, and independently usable by, blind and other visually impaired consumers.

39. Defendant has, upon information and belief, invested substantial sums in developing and maintaining Defendant's website, and Defendant has generated significant revenue from Defendant's website. These amounts are far greater than the associated cost of making Defendant's website equally accessible to visually impaired customers.

40. Without injunctive relief, Plaintiff will continue to be unable to independently use Defendant's website, violating her rights.

**COUNT I**

## **VIOLATIONS OF THE AMERICANS WITH DISABILITIES ACT, 42**

U.S.C. § 12181 ET SEQ.

41. Plaintiff alleges and incorporates herein by reference each and every allegation contained in paragraphs 1 through 40, inclusive, of this Complaint as if set forth fully herein.

42. Section 302(a) of Title III of the ADA, 42 U.S.C. § 12181 *et seq.*, provides: “No individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of any place of public accommodation by any person who owns, leases (or leases to), or operates a place of public accommodation.” 42 U.S.C. § 12182(a).

43. Under Section 302(b)(2) of Title III of the ADA, unlawful discrimination also includes, among other things: "a failure to make reasonable modifications in policies, practices, or procedures, when such modifications are necessary to afford such goods, services, facilities, privileges, advantages, or

1 accommodations to individuals with disabilities, unless the entity can demonstrate  
 2 that making such modifications would fundamentally alter the nature of such goods,  
 3 services, facilities, privileges, advantages or accommodations”; and “a failure to  
 4 take such steps as may be necessary to ensure that no individual with a disability is  
 5 excluded, denied services, segregated or otherwise treated differently than other  
 6 individuals because of the absence of auxiliary aids and services, unless the entity  
 7 can demonstrate that taking such steps would fundamentally alter the nature of the  
 8 good, service, facility, privilege, advantage, or accommodation being offered or  
 9 would result in an undue burden.” 42 U.S.C. § 12182(b)(2)(A)(ii)-(iii). “A public  
 10 accommodation shall take those steps that may be necessary to ensure that no  
 11 individual with a disability is excluded, denied services, segregated or otherwise  
 12 treated differently than other individuals because of the absence of auxiliary aids  
 13 and services, unless the public accommodation can demonstrate that taking those  
 14 steps would fundamentally alter the nature of the goods, services, facilities,  
 15 privileges, advantages, or accommodations being offered or would result in an  
 16 undue burden, i.e., significant difficulty or expense.” 28 C.F.R. § 36.303(a). In  
 17 order to be effective, auxiliary aids and services must be provided in accessible  
 18 formats, in a timely manner, and in such a way as to protect the privacy and  
 19 independence of the individual with a disability.” 28 C.F.R. § 36.303(c)(1)(ii).

20       44. Defendant’s location is a “public accommodation” within the meaning  
 21 of 42 U.S.C. § 12181 *et seq.* Upon information and belief, Defendant generates  
 22 millions of dollars in revenue from the sale of its amenities and services, privileges,  
 23 advantages, and accommodations in California through its location, related  
 24 services, privileges, advantages, and accommodations, and its website,  
 25 <https://www.ilsegretoristorante.com/>, is a service, privilege, advantage, and  
 26 accommodation provided by Defendant that is inaccessible to customers who are  
 27 visually impaired like Plaintiff. This inaccessibility denies visually impaired  
 28 customers full and equal enjoyment of and access to the facilities and services,

privileges, advantages, and accommodations that Defendant makes available to the non-disabled public. Defendant is violating the Americans with Disabilities Act, 42 U.S.C. § 12181 *et seq.*, in that Defendant denies visually impaired customers the services, privileges, advantages, and accommodations provided by <https://www.ilsegretoristorante.com/>. These violations are ongoing.

45. Pursuant to 42 U.S.C. § 12188 and the remedies, procedures, and rights set forth and incorporated therein, Plaintiff requests relief as set forth below.

111

## COUNT II

## **VIOLATIONS OF THE UNRUH CIVIL RIGHTS ACT, CALIFORNIA**

## **CIVIL CODE § 51 ET SEQ.**

46. Plaintiff alleges and incorporates herein by reference each and every allegation contained in paragraphs 1 through 45, inclusive, of this Complaint as if set forth fully herein.

47. Defendant's location is a "business establishment" within the meaning of the California Civil Code § 51 *et seq.* Upon information and belief, Defendant generates millions of dollars in revenue from the sale of its services in California through its location and related services, and <https://www.ilsegretoristorante.com/> is a service provided by Defendant that is inaccessible to customers who are visually impaired like Plaintiff. This inaccessibility denies visually impaired customers full and equal access to Defendant's facilities and services that Defendant makes available to the non-disabled public. Defendant is violating the Unruh Civil Rights Act, California Civil Code § 51 *et seq.*, in that Defendant is denying visually impaired customers the services provided by <https://www.ilsegretoristorante.com/>. These violations are ongoing.

48. Defendant is also violating the Unruh Civil Rights Act, California Civil Code § 51 *et seq.* in that the conduct alleged herein likewise constitutes a violation of various provisions of the ADA, 42 U.S.C. § 12101 *et seq.* Section 51(f)

1 of the California Civil Code provides that a violation of the right of any individual  
 2 under the ADA shall also constitute a violation of the Unruh Civil Rights Act.

3       49. The actions of Defendant were and are in violation of the Unruh Civil  
 4 Rights Act, California Civil Code § 51 *et seq.*, and, therefore, Plaintiff is entitled to  
 5 injunctive relief remedying the discrimination.

6       50. Plaintiff is also entitled to statutory minimum damages pursuant to  
 7 California Civil Code § 52 for each and every offense.

8       51. Plaintiff is also entitled to reasonable attorneys' fees and costs.

9       52. Plaintiff is also entitled to a preliminary and permanent injunction  
 10 enjoining Defendant from violating the Unruh Civil Rights Act, California Civil  
 11 Code § 51 *et seq.*, and requiring Defendant to take the steps necessary to make  
 12 <https://www.ilsegretoristorante.com/> readily accessible to and usable by visually  
 13 impaired individuals.

#### **PRAYER FOR RELIEF**

15       WHEREFORE, Plaintiff respectfully requests that the Court enter judgment  
 16 in her favor and against Defendant as follows:

- 17       A. A preliminary and permanent injunction pursuant to 42 U.S.C. §  
 18           12188(a)(1) and (2) and section 52.1 of the California Civil Code  
 19           enjoining Defendant from violating the Unruh Civil Rights Act and  
 20           ADA and requiring Defendant to take the steps necessary to make  
 21           <https://www.ilsegretoristorante.com/> readily accessible to and usable  
 22           by visually-impaired individuals;
- 23       B. An award of statutory minimum damages of \$4,000 per offense  
 24           pursuant to section 52(a) of the California Civil Code.
- 25       C. For attorneys' fees and expenses pursuant to California Civil Code §§  
 26           52(a), 52.1(h), and 42 U.S.C. § 12205;
- 27       D. For pre-judgment interest to the extent permitted by law;
- 28       E. For costs of suit; and

1 F. For such other and further relief as the Court deems just and proper.

2 **DEMAND FOR JURY TRIAL**

3 Plaintiff, on behalf of herself, hereby demands a jury trial for all claims so  
4 triable.

5  
6 Dated: November 11, 2022

Respectfully Submitted,

7 /s/ Binyamin I. Manoucheri  
8

9 Thiago M. Coelho

10 Binyamin I. Manoucheri

11 **WILSHIRE LAW FIRM**

12 *Attorneys for Plaintiff*